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**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

2004 Jan 3 P 12:08

CIVIL ACTION No.: 03 CV 12573 EFH

BERNADINE T. GRIFFITH
Plaintiff

vs.

ONEBEACON INSURANCE COMPANY,
ONEBEACON AMERICA INSURANCE
COMPANY, MICHAEL A. SISTO, and
KAREN ALLEN HOLMES
Defendants

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2004 Jan 3 P 12:09

CLERK OF COURT
DISTRICT OF MASS.

**RULE 15 (a) MOTION TO
AMEND VERIFIED COMPLAINT**

Now comes the Plaintiff, Bernadine T. Griffith, who respectfully moves this Honorable Court to allow the Plaintiff to amend her Verified Complaint, pursuant to Rule 15 (a), on the grounds that she inadvertently committed an error, as she does say:

- (1) On December 22, 2003, the Plaintiff commenced this action and she has not yet served any of the named Defendants.
- (2) In preparation of service, Plaintiff noticed that OneBeacon Insurance Company and OneBeacon America Insurance Company's former names were inadvertently interchanged in paragraph number five of the Verified Complaint.
- (3) Therefore, this amendment is simply to clarify two facts, that being when both companies changed their names in 2001: CGU Insurance Company changed its name to OneBeacon Insurance Company and Commercial Union Insurance Company changed its name to OneBeacon America Insurance Company. Whereas in the

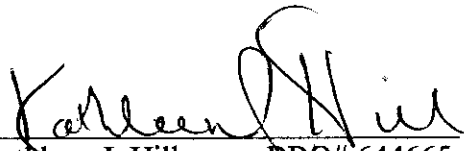
Verified Complaint, CGU Insurance Company is incorrectly referred to as OneBeacon America Insurance Company and Commercial Insurance Company is incorrectly referred to as OneBeacon Insurance Company.

- (4) This amendment is intended to correct any ambiguity or mistake concerning the identification of said Employers and will not prejudice any named party due to the timely filing of this Motion prior to service of the Verified Complaint.
- (5) The Plaintiff herein amends the third line preceding the first paragraph, which reads:
“CGU Insurance Company, formerly OneBeacon Insurance Company” to:
“OneBeacon Insurance Company, formerly, CGU Insurance Company.”
- (6) The Plaintiff herein amends the first line of the fifth paragraph, which reads:
“OneBeacon Insurance Company, formerly Commercial Union Insurance Company (hereinafter “CU”); and OneBeacon America Insurance Company, formerly CGU Insurance Company (hereinafter “CGU”) to: **“OneBeacon Insurance Company, formerly CGU Insurance Company (hereinafter “CGU”), and OneBeacon America Insurance Company, formerly Commercial Union Insurance Company (hereinafter “CU”).**
- (7) The Plaintiff herein amends the sixth - seventh line of the fifth paragraph, which reads: “On August 28, 2001, CGU Insurance Company changed its name to OneBeacon America Insurance Company” to: **“On August 28, 2001, CGU Insurance Company changed its name to OneBeacon Insurance Company.”**

WHEREFORE, the Plaintiff respectfully requests this Court allow the Plaintiff's Motion to Amend the Verified Complaint and order any other relief it deems necessary to allow this amendment.

Respectfully submitted,
BERNADINE T. GRIFFITH
By her Attorney,

Date: 1/2/04


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